

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

DAVID COPELAND and SHERRY COPELAND, on
behalf of themselves and all others similarly situated,

Plaintiffs,

v.

ALLSTATE INSURANCE COMPANY. and
ALLSTATE NEW JERSEY INSURANCE
COMPANY,

Defendants.

Civ. No. 14-1556 (AMD)(JO)

**MOTION TO STRIKE THE EXPERT DECLARATIONS
AND ATTACHED REPORTS OF CRAIG BARNET, HUBERT KLEIN
AND GERALD DOLAN REGARDING CLASS-WIDE INJURY OR DAMAGES**

PLEASE TAKE NOTICE that, upon the accompanying Declaration of Jennifer Rath and the exhibits annexed thereto, the transmittal declaration of Robert H. King, Jr. and the exhibits annexed thereto and the accompanying Memorandum of Law in Support of Defendants' Motion to Strike the Expert Declarations and Attached Reports of Craig Barnett, Hubert Klein and Gerald Dolan Regarding Class-Wide Injury or Damages, the undersigned counsel for Allstate Insurance Company and Allstate New Jersey Insurance Company (collectively "Defendants") hereby move before the Honorable Ann M. Donnelly, United States District Judge for the Eastern District of New York, for an Order pursuant to Fed. R. Civ. P. 26 and Federal Rule of Evidence 702, striking and excluding the expert declarations and attached reports of Craig Barnett, Hubert Klein and Gerald Dolan on the issues of class-wide injury or damages.

Under Local Civil Rule 6.1, Plaintiff's papers in opposition to this motion, if any, must be filed on or before March 28, 2016. Defendants' reply papers, if any, will be due to be filed on or before April 4, 2016. Defendants respectfully request oral argument on this motion.

Dated: New York, New York
March 14, 2016

DENTONS US LLP

By: /s/ Robert H. King, Jr.
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